EFACTS: 2420661

KEYSTONE CEMENT COMPANY

P.O. BOX A, BATH, PA 18014-0058 TELEPHONE (610) 837-1881

January 29, 2015

Mr. Mark J. Wejkszner, P.E.
Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
2 Public Square
Wilkes-Barre, PA 18701-0790

AIR QUALITY

JAN 30 2015

FACILITY:
PERMIT #:
COUNTY:
FILE CODE:

Ms. Diana Escher, Director
Air Protection Division
USEPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RECEIVED

FEB 03 2015

BETHLEHEM DISTRICT OFFICE
PA DEP

Re: *Submittal of 40 CFR Part 63.10(e)(3)(i)*
Summary Report – Excess Emissions and COMS Performance Report
For Units Subject to Subpart LLL
For the period of July 01, 2014 through December 31, 2014
Keystone Cement Company, Bath, Pennsylvania

Dear Mr. Wejkszner and Ms. Escher:

Keystone Cement Company (Keystone) is submitting the enclosed excess emissions and continuous opacity monitoring system (COMS) performance and summary report for emission units subject to the requirements of 40 CFR Part 63 Subpart LLL - National Emissions Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry (PC MACT). Keystone is submitting this report for the semi-annual period from July 01, 2014 through December 31, 2014 in accordance with the requirements of 40 CFR 63.1354 that were in effect prior to September 9, 2010. Pursuant to 40 CFR 63.1343(d), any source defined as an existing source in §63.1351, and that was subject to a particulate matter (PM), mercury, total hydrocarbon (THC), dioxins and furans (D/F), or opacity emissions limit prior to September 9, 2010, must continue to meet the limits shown in Table 2 to this section until September 9, 2015. The report was prepared in accordance with, and contains the information specified in, 40 CFR 63.10(e)(3)(i) and (vi).

Keystone's corrective actions outlined in their Startup, Shutdown, & Malfunction Plan (SSM Plan) only require that Method 9 observations be conducted in the event that the source is not shut down for corrective action within one (1) hour of observing visible emissions. Any such occurrences are, however, reported in the Periodic SSM Report submitted for this reporting period.

ADMINISTRATION
RT. 329, BATH, PA 18014-0058
FAX 610-837-2267

PLANT & RECEIVING
RT. 512, BATH, PA 18014-0058
FAX 610-837-2291

The total duration of excess emissions or process or control system exceedances was less than one (1) percent of the total operating time for the reporting period, and the CMS downtime for each operating parameter was less than five (5) percent of the total operating time for the reporting period. In accordance with §63.10(e)(3)(vii), the full excess emissions and CMS performance reports are not required during this reporting period.

If you have any questions or require any additional information please do not hesitate to contact me at (610) 837-1881 ext. 3213 or at Jeffery.Smith@gcpv.com.

Sincerely,

Jeffery W. Smith, P.E.
Manager, Environmental Compliance

Enclosures

1.0 Name and Address (physical location) of the Source (40 CFR 63.10(e)(3)(vi)(A)):

Keystone Cement Company
Route 329
P.O. Box A
Bath, PA 18014-0058

2.0 Hazardous Air Pollutants (HAPs) Monitored at the Source (40 CFR 63.10(e)(3)(vi)(B)):

Opacity as a surrogate for metal HAPs

3.0 Reporting Period (40 CFR 63.10(e)(3)(vi)(C)):

The reporting period covered by this report is from July 01, 2014 through December 31, 2014.

4.0 Description of Process Units (40 CFR 63.10(e)(3)(vi)(D)):

Clinker from Kiln No. 1 is sent through an associated clinker cooler, which is controlled by a baghouse before exhausting to the atmosphere.

5.0 Emission and Operating Parameter Limitations Specified in Standard (40 CFR 63.10(e)(3)(vi)(E)):

Per the list of relevant standards in Table 1 of 40 CFR 63.1342, clinker cooler, finish mill, and material handling exhausts are limited to 10% opacity on a six-minute block average basis.

6.0 Monitoring Equipment Manufacturer and Model Number (40 CFR 63.10(e)(3)(vi)(F)):

Clinker Cooler No. 1 Opacity – Monitor Labs, Light Hawk 560

7.0 Date of Latest CMS Certification or Audit (40 CFR 63.10(e)(3)(vi)(G)):

Clinker Cooler No. 1 Opacity – 10/2014

8.0 Total Operating Time for Each Source (40 CFR 63.10(e)(3)(vi)(H)):

The total operating time is provided in the attached excess emission data (Attachment 1) and CMS performance summaries provided in (Attachment 2).

9.0 Emission Data Summary (40 CFR 63.10(e)(3)(vi)(I)):

The emission data summary for this reporting period is provided in Attachment 1 of this report.

10.0 CMS Performance Summary (40 CFR 63.10(e)(3)(vi)(J)):

The CMS performance summary for this reporting period is provided in Attachment 2 of this report.

11.0 Description of Changes in CMS, Processes or Controls since Previous Reporting Period (40 CFR 63.10(e)(3)(vi)(K)):

There have been no changes in the CMS, process, or controls since the previous reporting period.

12.0 Certification and Report Date (40 CFR 63.10(e)(3)(vi)(L) and (M)):

I certify, based on a reasonable inquiry of the persons responsible for preparing this semi-annual report that the information provided is, to the best of my knowledge and belief true, accurate, and complete.

Stephen P. Holt, P.E.
Vice President, Environmental Compliance

January 29, 2015
Report Date

ATTACHMENT 1 -
PARAMETER DEVIATION SUMMARY

Keystone Cement Company - Bath, PA

MACT LLL Parameter Deviation Summary for Reporting Period: 07/01/2014 - 12/31/2014

No. 1 CCDC Operating Time = 205395				Deviation Summary							
Monitored Operating Limit	Emission Standard	Averaging Time	Description	Startup or Shutdown (min)	Control Equipment Malfunction (min)	Process Equipment Malfunction (min)	Other Known Cause (min)	Other Unknown Cause (min)	Total Duration of Deviation (min)	% Deviation [a,b]	Is the % Deviation greater than 1%?
Clinker Cooler Stack Opacity	10%	6-min block average	Duration of Events Where SSM Plan Was Followed	157	0	0	0	0	157		
			Duration of Events Where SSM Plan Was **Not** Followed	0	0	0	0	0	0	0.02	NO
			Duration of Exceedences **Not** a Result of a Startup, Shutdown, or Malfunction Event						45		

[a] Excursions caused by Startup, Shutdown, and Malfunction events where the SSM Plan was followed are not counted toward the 1% full Excess Emission Report threshold level.

[b] Per §63.10(e)(3)(vii) excess emissions and monitor downtime was calculated based on the total duration of excess emissions or monitor downtime per the total kiln operating time during the reporting period.

ATTACHMENT 2 -
COMS PERFORMANCE SUMMARY

Keystone Cement Company - Bath, PA
MACT LLL COMS Performance Summary for Reporting Period: 07/01/2014 - 12/31/2014

No. 1 CCDC Operating Time = 205395		CMS Downtime Summary							
Monitored Variable	Averaging Time	Monitoring Equipment Malfunctions (min)	Non-Monitoring Equipment Malfunctions (min)	QA/QC [a] Activity (min)	Other Known Causes (min)	Other Unknown Causes (min)	Total Duration of CMS Downtime (min)	% CMS [b] Downtime	Is the % CMS Downtime Greater than 5%?
Clinker Cooler Stack Opacity		1,932	0	5	0	0	1,937	0.94	NO

[a] "Routine calibrations" defined as normal zero and high level checks are not included in CMS downtime pursuant to 40 CFR 63.10(c)(5) and U.S. EPA's MACT reporting guidance

[b] Persuant to §63.10(e)(3)(vii) % CMS Downtime is calculated based on the total duration of CMS downtime per the total clinker cooler operating time during the reporting period.